

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

IN RE:

INNOVATIVE MAINTENANCE SERVICES, LLC
Debtor(s).

Chapter 11 Subchapter V
Case No. 24-60317

MOTION TO QUASH

Comes now Innovative Maintenance Services, LLC., debtor herein, by counsel, pursuant to Bankruptcy Code §362 (a), and respectfully represents:

1. That the debtor filed its petition for relief under Chapter 11 Subchapter V of Title 11 of the United States Code on March 27, 2024;
2. That the debtor is subject to a Notice of Federal Tax Lien;
3. That said garnishment is in favor of the Internal Revenue Services in the amount of \$118,200.69; and
4. That as of March 27, 2024, on information and belief, the garnished funds remain in the Debtor's bank account with First National Bank, or in transit to the creditor..

WHEREFORE, Debtor prays that said garnishment be quashed and that it has such other and further relief as the nature of its case may require.

Copies hereof are directed by mail to the debtor, First National Bank, and to the creditor.

Date: March 27, 2024

Respectfully submitted,

INNOVATIVE MAINTENANCE SERVICES, LLC.

By: /s/Andrew S. Goldstein
Of Counsel

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